

A.C. 42332

RICHARD HOUGHTALING

v.

COMMISSIONER OF CORRECTION

:

:

:

APPELLATE COURT

STATE OF CONNECTICUT

MARCH 11, 2020

MOTION FOR EXTENSION OF TIME TO FILE REPLY BRIEF

The petitioner-appellant moves for an extension of time to and including March 31, 2020 within which to file his reply brief. In support of this motion the petitioner-appellant relies upon the following: Opposing counsel has no objection to the granting of this motion.

I. BRIEF HISTORY OF THE CASE.

The petitioner appealed from the judgment of the habeas court denying his petition for writ of habeas corpus. The petitioner's brief was filed July 12, 2019, and the appellant's brief was filed February 7, 2020. The time for filing the petitioner's reply brief was extended from February 27th to the current due date of March 12, 2020.

II. SPECIFIC FACTS RELIED UPON.

This is the second motion for extension of time to file the reply brief. The first extension was requested due to undersigned counsel being called out of state due to a health crisis of an immediate family member. Since her return the undersigned has been both caring for her ill family member and working on the reply brief.

The undersigned did not write the original brief. As a result, she has been required to devote a substantial portion of her time to ensure that she was thoroughly familiar with the record as it pertains to the arguments to be presented in the reply brief. An extension to and including March 31, 2020 is requested.

III. LEGAL BASIS.

This motion is filed pursuant to Practice Book §§66-1 through 66-3 as well as the defendant-appellant's federal and state constitutional and statutory rights to due process of law and effective assistance of counsel.

WHEREFORE, the requested extension should be granted.

Granted as a Final Extension to 3/31/2020.

Notice Sent: 3/11/2020

Counsel of Record

Lm

1933187

Respectfully submitted,

RICHARD HOUGHTALING
The Petitioner-Appellant

BY: 

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CERTIFICATION

Pursuant to P.B. §§ 62-7 and 66-3 I hereby certify that a copy of the foregoing was or immediately will be sent electronically on March 11, 2020 to:

ASA Nancy L. Walker
Office of the Chief State's Attorney- Appellate Bureau-OCSA
300 Corporate Place Rocky Hill, CT 06067
Tel. 860-258-5807 Fax 860-258-5828
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contact@ctpostconviction.com

and was sent by mail to:

Richard Houghtaling
32 Fleetwood Drive
Danbury, CT 06810

I further certify that this document (1) has been redacted or does not contain any names or other personal identifying information that is prohibited from disclosure by rule, statute, court order or case law; and (2) complies with all applicable rules of appellate procedure.

BY: 

Temmy Ann Miller
Pieszak-Miller & Brodeur, LLC